

## **EXHIBIT “B”**

2016-78777 / Court: 151

CAUSE NO. \_\_\_\_\_

JUANA MURILLO,	§	IN THE DISTRICT COURT
	§	
<i>Plaintiff,</i>	§	
	§	
VS.	§	OF HARRIS COUNTY, TEXAS
	§	
ANDRES MAURICIO CLAVIJO, PV	§	
HOLDINGS CORP., AND AVIS	§	
BUDGET CAR RENTAL, LLC,	§	
	§	
<i>Defendants.</i>	§	_____ JUDICIAL DISTRICT

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**PLAINTIFF'S ORIGINAL PETITION**

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COMES NOW JUANA MURILLO., Plaintiff, complaining of Defendants, ANDRES MAURICIO CLAVIJO, PV HOLDINGS CORP., AND AVIS BUDGET CAR RENTAL, LLC and for cause of action shows:

**A.**  
**APPLICABLE DISCOVERY CONTROL PLAN**

1. Pursuant to Rule 47, Texas Rules of Civil Procedure, Plaintiff pleads that the damages in this cause exceed \$100,000.00, but are not expected to exceed \$200,000.00. Further, pursuant Rule 190.3, TRCP, discovery in this case will be conducted under a Level 2 Discovery Control Plan.

**B.**  
**PARTIES**

2. Plaintiff is an individual and resides in Harris County, Texas.

3. Defendant, ANDRES MAURICIO CLAVIJO, is an individual residing in Harris County, Texas, and may be served with process by serving him at his usual place of residence. 2929 Shadowbriar Drive, #1336, Houston, Texas 77082.

4. Defendant, PV HOLDINGS CORP., is a foreign for profit corporation doing business in the state of Texas who may be served with process by serving its registered agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 701 Brazos Street, Suite 1050, Austin, Texas 78701.

5. Defendant, AVIS BUDGET CAR RENTAL, LLC, is a limited liability Company, doing business in the state of Texas who may be served with process by serving its registered agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company 701 Brazos Street, Suite 1050, Austin, Texas 78701-3232

**C.**  
**MISOMER/ALTER EGO**

6. In the event any parties are misnamed or are not included herein, it is Plaintiff's contention that such was a "misidentification", "misnomer" and/or such parties are/were "alter egos" of parties named herein. Alternatively, Plaintiff contends that such "corporate veils" should be pierced to hold such parties properly included in the interest of justice.

**D.**  
**VENUE AND JURISDICTION**

7. The Court has jurisdiction in this cause since the damages to Plaintiff are within the jurisdictional limits of the Court.

8. Pursuant to Sections 15.001 and 15.002(a)(1) of the Texas Civil Practice and Remedies Code, this venue is proper because all, or substantial part of, the events or omissions giving rise to the claim occurred in Harris County, Texas. The venue is also proper because it best serves the convenience of the parties and witnesses, as well as the interests of justice.

9. Plaintiff has satisfied all conditions precedent to this lawsuit.

10. Nothing Plaintiff did cause or contributed to this occurrence.

**E.**  
**FACTS**

11. This lawsuit results from an automobile collision which occurred on November 15, 2014, in the 8800 block of Westpark near the intersection of 4800 Fondren Road, Houston, Texas.

12. Plaintiff, Juana Murillo, was the driver of a gold 2007 Nissan Versa vehicle with the license plate number DX4R122. Plaintiff was traveling eastbound on the 8000 block of Westpark Drive in Houston, Texas.

13. At the same time and location, Defendant, Andres Mauricio Clavijo, was the driver of a silver 2014 Toyota Venza vehicle with Texas license plate number CRK6884. Defendant was traveling northbound on Fondren Rd. Plaintiff was stopped at the Fondren light and proceeded through the intersection when her light turned green. Defendant ran the stop light at Westpark and unexpectedly and violently struck Plaintiff's vehicle with great force, causing the injuries and damages complained of herein.

**F.**  
**NEGLIGENCE OF DEFENDANT ANDRES MAURICIO CLAVIJO**

14. At the time of the accident, Defendant was operating/using his motor vehicle negligently. Defendant's negligence was the proximate cause of Plaintiff's injuries. Defendant had a duty to exercise ordinary care and operate his motor vehicle reasonably and prudently. Defendant breached that duty in one or more of the following ways:

- a. failing to yield row – stop and go signal;
- b. failing to stop in time;
- c. failing to control his vehicle's speed;
- d. failing to apply brakes in a timely manner;
- e. failing to maintain a proper lookout;
- f. failing to take proper evasive action;
- g. failing to operate the vehicle as a person of ordinary prudence would have done under the same or similar circumstances;

- h. failing to maintain such lookout as a person of ordinary prudence would have maintained under the same or similar circumstances;
- i. drove the vehicle at a rate of speed greater than that at which an ordinary and prudent person would have driven under the same or similar circumstances; and
- j. other acts of negligence and negligence *per se*.

15. One, some, or all of the foregoing acts and/or omissions on the part of Defendant constituted negligence and/or negligence *per se*. Such negligence was a proximate cause of the injuries and damages received by Plaintiff.

**G.**  
**DAMAGES**

16. As a result of the incident made the basis of this lawsuit described in the preceding paragraphs and the negligence of Defendant, Plaintiff sustained significant injuries and damages in the past and will in reasonable probability sustain these damages in the future.

17. Plaintiff respectfully requests that the trier of fact determine the amount of his damages and losses that he has incurred in the past and will reasonably incur in the future, as well as the monetary value of these damages, which include, but are not limited to:

- a. Past, present, and future physical pain and suffering;
- b. Past, present, and future loss of earning capacity;
- c. Past, present, and future disfigurement;
- d. Past, present, and future physical impairment;
- e. Past, present, and future medical care expenses; and
- f. Past, present, and future out-of-pocket economic losses.

18. Because of all of the above and foregoing, Plaintiff has suffered actual damages in excess of the minimum jurisdictional limits of the Court for which damages Plaintiff now brings suit.

**H.**  
**NEGLIGENCE OF PV HOLDINGS CORP.**

19. At the time of the collision in question, the vehicle being driven by Defendant ANDRES MAURICIO CLAVIJO was owned, controlled, and/or leased by Defendant, PV HOLDINGS CORP. On the occasion in question, PV HOLDINGS CORP. entrusted its vehicle to Defendant, ANDRES MAURICIO CLAVIJO. At the time said vehicle was entrusted, Defendant, ANDRES MAURICIO CLAVIJO, was an incompetent, reckless, and/or unlicensed driver and was unfit to operate a motor vehicle on public streets and highways of Texas. Said acts and/or omissions on the part of Defendant, PV HOLDINGS CORP., constituted negligence which proximately caused the collision in question and the injuries and damages suffered by the Plaintiff herein.

**H.**  
**NEGLIGENCE OF AVIS BUDGET CAR RENTALS, LLC**

20. At the time of the collision in question, the vehicle being driven by Defendant ANDRES MAURICIO CLAVIJO was owned, controlled, and/or leased by Defendant, AVIS BUDGET CAR RENTALS, LLC. On the occasion in question, AVIS BUDGET CAR RENTALS, LLC entrusted its vehicle to Defendant, ANDRES MAURICIO CLAVIJO. At the time said vehicle was entrusted, Defendant, ANDRES MAURICIO CLAVIJO, was an incompetent, reckless, and/or unlicensed driver and was unfit to operate a motor vehicle on public streets and highways of Texas. Said acts and/or omissions on the part of Defendant, AVIS BUDGET CAR RENTALS, LLC, constituted negligence which proximately caused the collision in question and the injuries and damages suffered by the Plaintiff herein

**I.**  
**PRE-EXISTING CONDITIONS**

21. In the alternative, Plaintiff would show that if any injury and/or condition from which he currently suffers was pre-existing, then such condition was aggravated, exacerbated and/or made worse by the negligence of the Defendants herein.

**J.**  
**SUBSEQUENT CONDITION**

22. In the alternative, Plaintiff would show that if he suffers from any subsequent injury and/or condition, then such injury and or condition was aggravated and/or exacerbated by the negligence of the Defendants herein.

**K.**  
**U.S. LIFE TABLES**

23. Plaintiff hereby notify the Defendant of their intent to use U.S. Life Tables as published by the U.S. Government in the trail of this matter.

**L.**  
**JURY DEMAND**

24. Pursuant to Rule 216 of the Texas Rules of Civil Procedure, Plaintiff respectfully requests and demands a trial by jury.

**M.**  
**RULE 193.7 NOTICE**

25. Plaintiff hereby gives notice to all parties that Plaintiff intends to use any and all documents that are produced by a party against that party in pretrial proceedings or at trial pursuant to the Texas Rules of Civil Procedure 193.7.

**N.**  
**REQUEST FOR DISCLOSURE**

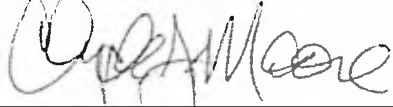
26. Pursuant to Rule 194, request is made that each Defendant discloses, within fifty (50) days of service of this request, the information or material described in Texas Rules of Civil Procedure 194.2(a)-(l). Each Defendant must serve a written response to these Requests for Disclosure on Plaintiff within fifty (50) days after the service of this Request. Failure to timely respond shall constitute an abuse of discovery pursuant to the Texas Rules of Civil Procedure 215.

**O.**  
**PRAYER**

WHEREFORE Plaintiff prays that Defendants be cited in terms of law to appear and answer herein and that, upon final trial and hearing hereof, Plaintiff recover damages in accordance with the evidence, costs of Court herein expended, interest justly entitled under the law, and that Plaintiff be granted such other and further relief, both general and special, at law and in equity, to which Plaintiff may be justly entitled.

Respectfully submitted,

**LAW OFFICE OF CLYDE J. MOORE**

By: 

**CLYDE J. MOORE**

State Bar No. 14323690

6001 Savoy Drive

Houston, Texas 77036

713/ 953-9009; Telephone

713/ 953-9049; Facsimile

[attycjmoore@yahoo.com](mailto:attycjmoore@yahoo.com)

**ATTORNEY FOR PLAINTIFF**





I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this December 15, 2016

Certified Document Number: 72725513 Total Pages: 7

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

12/5/2016 11:09:20 AM  
Chris Daniel - District Clerk Harris County  
Envelope No. 14098212  
By: JIMMY RODRIGUEZ  
Filed: 12/5/2016 11:09:20 AM

RECEIPT NUMBER 00TRACKING NUMBER 7331583 CIVCAUSE NUMBER 001674777

PLAINTIFF: MURILLO, JUANA

vs.

DEFENDANT: CLAVIJO, ANDRES MAURICIO

In The 151st  
Judicial District Court of  
Harris County, Texas

## CITATION CORPORATE

THE STATE OF TEXAS  
County of Harris

TO: PV HOLDINGS CORP (A FOREIGN FOR PROFIT CORPORATION) BY SERVING ITS  
REGISTERED AGENT CORPORATION SERVICE COMPANY (RBA CCC-LAWIERS  
INCORPORATING SERVICE COMPANY)  
701 BRAZOS STREET SUITE 1050 AUSTIN TX 78701.

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION.

This instrument was filed on the 14th day of November, 2016, in the  
above cited cause number and court. The instrument attached describes the claim against you.

**YOU HAVE BEEN SUED;** you may employ an attorney. If you or your attorney do not file a written answer with the  
District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were  
served this citation and petition, a default judgment may be taken against you.

## TO OFFICER SERVING:

This Citation was issued under my hand and seal of said Court, at Houston, Texas, this 16th day of  
November, 2016.

Issued at request of:  
MOORE, CLYDE JERALD  
6001 SAVOY CR 303  
HOUSTON, TX 77036  
TEL: (713) 953-9009  
Bar Number 14323690



*Chris Daniel*  
CHRIS DANIEL, District Clerk  
Harris County, Texas  
201 Caroline, Houston, Texas 77002  
P.O. Box 4651, Houston, Texas 77210

Generated by: CHAMBERS, WANDA RENEE  
ULW/10538349

## OFFICER/AUTHORIZED PERSON RETURN

I received this citation on the 18th day of November, 2016, at 5 o'clock P. M., endorsed

the date of delivery thereon, and executed it at \_\_\_\_\_

in \_\_\_\_\_ County, Texas on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_ M.,

by delivering to \_\_\_\_\_, by delivering to its

\_\_\_\_\_ in person, whose name is \_\_\_\_\_

a true copy of this citation, with a copy of the \_\_\_\_\_ Petition attached.

and with accompanying copies of \_\_\_\_\_

I certify that the facts stated in this return are true by my signature below on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

FEE: \$ \_\_\_\_\_ By: \_\_\_\_\_

Printed Name \_\_\_\_\_

Affiant Other Than Officer \_\_\_\_\_ As Deputy for: \_\_\_\_\_

On this day, \_\_\_\_\_, known to me to be the person whose signature  
appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this citation was  
executed by him/her in the exact manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

\*7331583\*

**RETURN OF SERVICE**

**Cause No. 201678777**

In the 151st Judicial District of  
Harris County, Texas

JUANA MURILLO  
Plaintiff

V.

ANDRES MAURICIO CLAVIJO,  
et al  
Defendant

Came to hand on November 18, 2016, at 05:00 PM.

Executed at 211 E. 7th Street, Suite 620, Austin, TX 78701, within the County of Travis at 10:40 AM on November 21, 2016, by delivering to the within named:

**PV HOLDINGS CORP.,**

**by delivering to its Registered Agent, CORPORATION SERVICE COMPANY d/b/a CSC-LAWYERS INCORPORATING SERVICE COMPANY, by and through its designated agent, KELLY COURTNEY, a true copy of this Citation together with Plaintiff's Original Petition, having first endorsed upon such copy of such process the date of delivery.**

I certify that I am approved by the Supreme Court of Texas, Misc. Docket No. 05-9122 under rule 103 and 536(a) of the TRCP to deliver citations and other notices from any District, County, and Justice Courts in and for the State of Texas. I am competent to make this oath: I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime involving moral turpitude, and I am not interested in the outcome of the above-referenced cause.

By:   
Thomas R. Kroll SCH-3012,  
Exp: 8/31/2019

**VERIFICATION**

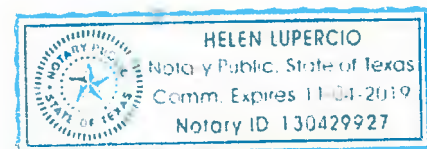
STATE OF TEXAS       §  
COUNTY OF TRAVIS   §

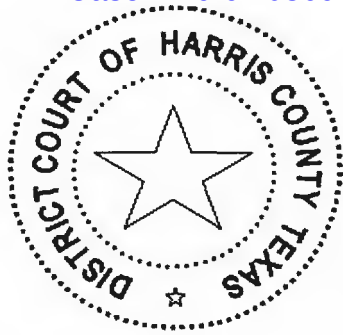
BEFORE ME, A NOTARY PUBLIC, on this day personally appeared Thomas R. Kroll, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are true and correct.

Given under my hand and seal of office this November 22, 2016.

16-023531/Murillo

  
NOTARY PUBLIC, STATE OF TEXAS





I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 15, 2016

Certified Document Number: 72958191 Total Pages: 2

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

12/20/2016 11:09:20 AM  
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 By: JIMMY RODRIGUEZ  
 Filed: 12/5/2016 11:09:20 AM

CAUSE NO. 201676777

RECEIPT NO. 0.00 CIV  
 \*\*\*\*\*  
 TR # 73311586

PLAINTIFF: MURILLO, JUANA  
 vs.  
 DEFENDANT: CLAVICO, ANDRES MAURICIO

In The 1st  
 Judicial District Court  
 of Harris County, Texas  
 1st DISTRICT COURT  
 Houston, TX

## CITATION

THE STATE OF TEXAS  
 County of Harris

TO: AVIS BUDGET CAR RENTAL LLC (A LIMITED LIABILITY COMPANY) BY SERVING  
 ITS REGISTERED AGENT CORPORATION SERVICE COMPANY  
 (DBA CSC-LAWYERS INCORPORATING SERVICE COMPANY)  
 701 BRAZOS STREET SUITE 1050 AUSTIN TX 78701 - 3232  
 Attached is a copy of PLAINTIFF'S ORIGINAL PETITION

This instrument was filed on the 14th day of November, 2016, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of 30 days after you were served this citation and petition, a default judgment may be taken against you.

## TO OFFICER SERVING:

This citation was issued on 14th day of November, 2016, under my hand and seal of said Court.

Issued at request of:  
 MOORE, CLYDE JERALD  
 6001 SAVOY DR 303  
 HOUSTON, TX 77036  
 Tel: (713) 953-9009  
 Bar No.: 14323690



*Chris Daniel*

CHRIS DANIEL, District Clerk  
 Harris County, Texas  
 201 Caroline, Houston, Texas 77002  
 (P.O. Box 4651, Houston, Texas 77210)

Generated By: CHAMBERS, WANDA RENEE ULW//10538969

## OFFICER/AUTHORIZED PERSON RETURN

Came to hand at 5:00 o'clock P.M., on the 18th day of November, 2016.

Executed at (address) \_\_\_\_\_ in

\_\_\_\_\_ County at \_\_\_\_\_ o'clock \_\_\_\_\_ .M., on the \_\_\_\_\_ day of \_\_\_\_\_,

\_\_\_\_\_, by delivering to \_\_\_\_\_ defendant, in person, a

true copy of this Citation together with the accompanying \_\_\_\_\_ copy(ies) of the Petition

attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this \_\_\_\_\_ day of \_\_\_\_\_.

FFR: S \_\_\_\_\_

RETURN / AFFIDAVIT  
 PROOF - ATTACHED

\_\_\_\_\_, County, Texas

Affiant \_\_\_\_\_

By \_\_\_\_\_ Deputy

On this day, \_\_\_\_\_, known to me to be the person whose signature appears on the foregoing return, personally appeared. After being by me duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
 Notary Public

N 100 1100 P

\*73311586\*

**RETURN OF SERVICE**

**Cause No. 201678777**

In the 151st Judicial District of  
Harris County, Texas

JUANA MURILLO  
Plaintiff

V.

ANDRES MAURICIO CLAVIJO,  
et al  
Defendant

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Executed at 211 E. 7th Street, Suite 620, Austin, TX 78701, within the County of Travis at 10:40 AM on November 21, 2016, by delivering to the within named:

**AVIS BUDGET CAR RENTAL LLC,**

**by delivering to its Registered Agent, CORPORATION SERVICE COMPANY d/b/a CSC-LAWYERS INCORPORATING SERVICE COMPANY, by and through its designated agent, KELLY COURTNEY, a true copy of this Citation together with Plaintiff's Original Petition, having first endorsed upon such copy of such process the date of delivery.**

I certify that I am approved by the Supreme Court of Texas, Misc. Docket No. 05-9122 under rule 103 and 536(a) of the TRCP to deliver citations and other notices from any District, County, and Justice Courts in and for the State of Texas. I am competent to make this oath: I am not less than 18 years of age. I am not a party to the above-referenced cause. I have not been convicted of a felony or a crime involving moral turpitude, and I am not interested in the outcome of the above-referenced cause.

By: 

Thomas R. Kroll SCH-3012,  
Exp: 8/31/2019

**VERIFICATION**

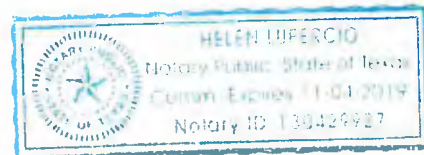
STATE OF TEXAS       §  
COUNTY OF TRAVIS   §

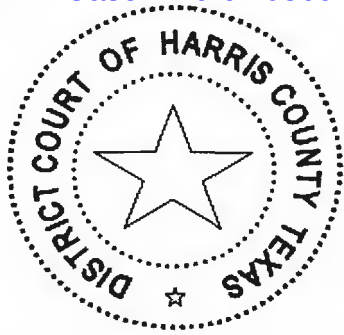
BEFORE ME, A NOTARY PUBLIC, on this day personally appeared Thomas R. Kroll, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are true and correct.

Given under my hand and seal of office this November 22, 2016.

16-023532/Murillo

  
NOTARY PUBLIC, STATE OF TEXAS





I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 15, 2016

Certified Document Number: 72958190 Total Pages: 2

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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CAUSE NO. 2016-78777

JUANA MURILLO	§	IN THE DISTRICT COURT OF
	§	
	§	
	§	
V.	§	HARRIS COUNTY, TEXAS
	§	
ANDRES MAURICIO CLAVIJO, PV	§	
HOLDINGS CORP., AND AVIS	§	
BUDGET CAR RENTAL, LLC	§	151 <sup>ST</sup> JUDICIAL DISTRICT

**DEFENDANTS' ORIGINAL ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Defendants, PV HOLDING CORP. and AVIS BUDGET CAR RENTAL, LLC, and in response to Plaintiff's Original Petition, files this Original Answer and would respectfully show as follows:

**GENERAL DENIAL**

1. As allowed by Rule 92 of the Texas Rules of Civil Procedure, Defendants deny generally the allegations contained in Plaintiff's Original Petition and demands strict proof of each of the allegations contained therein.
2. In the alternative, and without waiving the foregoing, Defendant pleads Plaintiffs' damages, if any, for medical or health care expenses are limited by § 41.0105 of the TEXAS CIVIL PRACTICE AND REMEDIES CODE.
3. In the alternative, and without waiving the foregoing, Defendants would show that to the extent Plaintiff is asserting a recovery for loss of earnings, loss of earning capacity, loss of contributions of a pecuniary value or loss of inheritance, the limitations of § 18.091 of the TEXAS CIVIL PRACTICE AND REMEDIES CODE apply.



**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Defendants, PV HOLDING CORP. and AVIS BUDGET CAR RENTAL, LLC, respectfully pray that upon trial of this case, they have judgment in their favor, that Plaintiff take nothing by reason of this suit, that Defendants recover their costs incurred herein, and that they receive such further and other relief to which they are justly entitled.

Respectfully Submitted,

DONATO, MINX, BROWN & POOL, PC

By: 

Aaron Pool, SBN 16115400  
3200 Southwest Freeway  
Phoenix Tower, Suite 2300  
Houston, Texas 77027-7525  
Phone: 713-877-1112  
Fax: 713-877-1138  
[apool@donatominxbrown.com](mailto:apool@donatominxbrown.com)

**ATTORNEYS FOR DEFENDANTS**


**CERTIFICATE OF SERVICE**

I hereby certify that, on the 12th day of December, 2016, a true and correct copy of the above and foregoing has been served by:

☐ certified mail, return receipt requested; ☐ overnight delivery; ☐ hand delivery; ☐ United States first class mail; ☒ facsimile transmission; ☒ electronic transmission on the following counsel:

Plaintiff's Attorney:

Clyde J. Moore  
Law Office of Clyde J. Moore  
6001 Savoy Drive  
Houston, Texas 77036  
713-953-9009  
713-953-9049

  
\_\_\_\_\_  
Aaron Pool



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this December 15, 2016

Certified Document Number: 73045760 Total Pages: 3

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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CAUSE NO. 2016-78777

JUANA MURILLO

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§

IN THE DISTRICT COURT OF

V.

HARRIS COUNTY, TEXAS

ANDRES MAURICIO CLAVIJO, PV  
HOLDINGS CORP., AND AVIS  
BUDGET CAR RENTAL, LLC151<sup>ST</sup> JUDICIAL DISTRICT

---

**DEFENDANTS' JURY DEMAND**

---

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, PV HOLDING CORP. and AVIS BUDGET CAR RENTAL, LLC,  
Defendants in the above entitled and numbered cause, and make their formal demand  
for trial by jury in this matter, and tenders the requisite fee with this filing.

Respectfully Submitted,

DONATO, MINX, BROWN &amp; POOL, PC

By: 

Aaron Pool  
SBN 16115400  
3200 Southwest Freeway  
Phoenix Tower, Suite 2300  
Houston, Texas 77027-7525  
Phone: 713-877-1112  
Fax: 713-877-1138  
[apool@donatominxbrown.com](mailto:apool@donatominxbrown.com)

**ATTORNEY FOR DEFENDANTS**


**CERTIFICATE OF SERVICE**

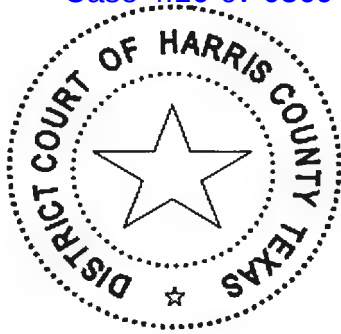
I hereby certify that, on the 12th day of December, 2016, a true and correct copy of the above and foregoing has been served by:

☐ certified mail, return receipt requested; ☐ overnight delivery; ☐ hand delivery; ☐ United States first class mail; ☒ facsimile transmission; ☒ electronic transmission on the following counsel:

Plaintiff's Attorney:

Clyde J. Moore  
Law Office of Clyde J. Moore  
6001 Savoy Drive  
Houston, Texas 77036  
713-953-9009  
713-953-9049

  
\_\_\_\_\_  
Aaron Pool



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this December 15, 2016

Certified Document Number: 73045761 Total Pages: 2

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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## CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY)

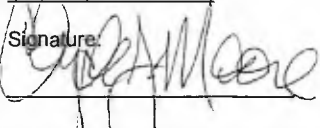
COURT (FOR CLERK USE ONLY)

Styled: Juana Murillo v. Andres Mauricio Clavijo, PV Holdings Corp., and Avis Budget Car Rental, LLC

11/14/2016 4:51:22 PM  
 Chris Daniel - District Clerk  
 Harris County  
 Envelope No: 13783818  
 By: EVANS, BONISHA E  
 Filed: 11/14/2016 4:51:22 PM

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing. This sheet, approved by the Texas Judicial Council, is intended to collect information that will be used for statistical purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

<b>1. Contact Information for person completing case information</b> Name: <u>Clyde J. Moore</u> Email: <u>attycjmoore@yahoo.com</u> Address: <u>6001 Savoy Drive, Suite 303</u> Telephone: <u>713.953.9009</u> City/State/Zip: <u>Houston, Texas 77036</u> Fax: <u>713.953.9049</u> Signature:  State Bar No: <u>14323690</u> [Attach additional page as necessary to list all parties]		<b>Names of parties in case:</b> Plaintiff/Petitioner: <u>Juana Murillo</u> Defendant(s)/Respondent(s): <u>Andres Mauricio Clavijo, PV Holdings Corp., and Avis Budget Car Rental, LLC</u>		<b>Person or entity completing sheet</b> <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: Additional Parties in Child Support Case: Custodial Parent: Non-Custodial Parent: Presumed Father:					
<b>2. Indicate case type, or identify the most important issue in the case (select only 1):</b>									
<b>Civil</b>			<b>Family Law</b>						
<b>Contract</b> <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: <b>Foreclosure</b> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:		<b>Injury or Damage</b> <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <b>Malpractice</b> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional <b>Liability:</b> <input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <b>Product Liability</b> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: <input type="checkbox"/> Other Injury or Damage:		<b>Real Property</b> <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus— Pre-indictment <input type="checkbox"/> Other:		<b>Marriage Relationship</b> <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <b>Divorce</b> <input type="checkbox"/> With Children <input type="checkbox"/> No Children <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other:		<b>Post-judgment Actions (non-Title IV-D)</b> <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Paternity/Parentage <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child:	
<b>Employment</b> <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment:		<b>Other Civil</b> <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other:							
<b>Tax</b> <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax		<b>Probate &amp; Mental Health</b> <b>Probate/Wills/Intestate Administration</b> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other:							
<b>3. Indicate procedure or remedy, if applicable (may select more than 1):</b>									
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover					



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office  
this December 15, 2016

Certified Document Number: 72725516 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**



Harris County Docket Sheet

**2016-78777**

**COURT:** 151st

**FILED DATE:** 11/14/2016

**CASE TYPE:** Motor Vehicle Accident



**MURILLO, JUANA**

Attorney: MOORE, CLYDE JERALD

**VS.**

**CLAVIJO, ANDRES MAURICIO**

**Docket Sheet Entries**

Date	Comment
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